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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JASON HALPERN,

Plaintiff,

vs.

GARY THARALDSON,

Defendant.

Case No. 2:15-cv-02037-JCM-GWF

**MOTION FOR PERMISSION FOR
WILLIAM R. FRIED, ESQ. TO
APPEAR TELEPHONICALLY AT
HEARING ON PLAINTIFF'S
MOTION FOR EXTENSION OF
DISCOVERY DEADLINE
SCHEDULED FOR APRIL 18, 2016,
AT 1:30 P.M. BEFORE U.S.
MAGISTRATE JUDGE GEORGE W.
FOLEY JR.**

**[PROPOSED ORDER GRANTING
MOTION CONTAINED HEREIN]**

Plaintiff, Jason Halpern, by and through his counsel, hereby moves for permission for William R. Fried, Esq. to appear telephonically at hearing on Plaintiff's Motion for Extension of Discovery Deadline, which is scheduled for April 18, 2016 at 1:30 p.m. before U.S. Magistrate Judge George W. Foley, Jr.

1 This Motion is based on the following Memorandum of Points and Authorities, all
2 pleadings and other papers already on file in this matter, and any oral argument the Court may
3 entertain at any hearing on this matter.

4 DATED this 13th day of April, 2016.

5 **RICE REUTHER SULLIVAN & CARROLL, LLP**

6
7 By: /s/ William R. Fried, Esq.

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MEMORANDUM OF POINTS AND AUTHORITIES

Plaintiff Halpern, through his counsel, hereby requests that the Court grant Mr. William R. Fried, Esq. permission to appear telephonically at hearing on Plaintiff's Motion for Extension of Discovery Deadline (Dkt. # 40), which is scheduled for April 18, 2016 at 1:30 p.m. before U.S. Magistrate Judge George W. Foley, Jr. (Dkt. # 41).

Mr. Fried is an attorney residing and practicing in New York, New York and he is admitted *Pro Hac Vice* in this case. Mr. Fried desires to participate in the April 18, 2016, hearing and respectfully requests to do so telephonically. Mr. Fried's local counsel will attend the hearing in person. Mr. Fried submits that (i) there is no prejudice to any party by allowing him to appear telephonically, (ii) this request is reasonable given the time and cost associated with appearing in person and where his local counsel will appear in person, and (iii) he believes he will be able to participate meaningfully and satisfactorily in the hearing process through a telephonic appearance.

DATED this 13th day of April, 2016.

RICE REUTHER SULLIVAN & CARROLL, LLP

By: /s/ William R. Fried, Esq.

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**ORDER GRANTING MOTION FOR PERMISSION FOR WILLIAM R. FRIED, ESQ. TO
APPEAR TELEPHONICALLY AT HEARING ON PLAINTIFF'S MOTION FOR
EXTENSION OF DISCOVERY DEADLINE SCHEDULED FOR APRIL 18, 2016, AT 1:30
P.M. BEFORE U.S. MAGISTRATE JUDGE GEORGE W. FOLEY JR.**

Upon consideration of the foregoing Motion and finding good cause appearing,

IT IS HEREBY ORDERED that Plaintiff's Motion is GRANTED and William R. Fried, Esq. may appear telephonically for the hearing on Plaintiff's Motion for Extension of Discovery Deadline, which is scheduled for April 18, 2016 at 1:30 p.m. before U.S. Magistrate Judge George W. Foley, Jr.

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: April 14, 2016

CERTIFICATE OF SERVICE

Pursuant to Fed.R.Civ.P. 5(b), and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of Rice Reuther Sullivan & Carroll, LLP, and that a true and correct copy of the **MOTION FOR PERMISSION FOR WILLIAM R. FRIED, ESQ. TO APPEAR TELEPHONICALLY AT HEARING ON PLAINTIFF'S MOTION FOR EXTENSION OF DISCOVERY DEADLINE SCHEDULED FOR APRIL 18, 2016, AT 1:30 P.M. BEFORE U.S. MAGISTRATE JUDGE GEORGE W. FOLEY JR.** was served via electronic service, via CM/ECF, on this 13th day of April, 2016, to the addresses shown below:

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/s/ Gayle McCrea
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